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Dear Clay, Ryan, and Eric,

On behalf of the John Muir Project of Earth Island Institute, I am submitting these scoping comments on the proposed Hartman and Tamarack post-fire logging proposals in the 2020 North Complex fire area.

1: At least an EA, or an EIS, must be prepared. Using two CEs in the North fire complex is illegal segmentation of analysis under NEPA, which undermines cumulative effects analysis.

2: There are highly controversial effects and unknown risks of these projects, including adverse impacts to spotted owls (see Hanson et al. 2018, Lee 2020, and Hanson et al. 2021, attached), black-backed woodpeckers (see Hanson and Chi 2020, attached), and increased subsequent fire intensity resulting from post-fire logging and artificial planting (Donato et al. 2006, Thompson et al. 2007, Hanson 2021 in review--see attached).

3: The scoping notices for both Hartman and Tamarack mischaracterize the Coppoletta et al. (2016) study. That study shows that areas which burn at high-severity typically reburn at overall *lower* levels of severity, with mostly low/moderate-severity effects in reburns. See, e.g., Figure 3 of Coppoletta et al. (showing 21% high-severity fire in initial burn and only 9% high-severity in reburn) and Figure 6.

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8 attachments:

CSO Hanson, Lee, and Bond 2021.pdf
CSO Hanson, Bond, and Lee 2018.pdf
CSO Lee 2020 reply to Jones et al 2020.pdf
Fire Hanson and Chi 2020.pdf
Fire Donato et al 2006.pdf
Fire Thompson et al 2007.pdf
Hanson 2021 Creek fire study revision 31Aug21.pdf
Hanson 2021 Creek fire study revision Figure 1 31Aug21.pdf